

NWS-00347- 02.01 - 03/10/94



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Date: March 10, 1994

Ms. Brenda Norton, PE
Atlantic Division, Naval Facilities Engineering Command
Environmental Quality Division
Code: 1822
Building N 26, Room 54
1510 Gilbert Street
Norfolk, Va 23511-2699

Re: Naval Weapons Station, Yorktown, Va.
Non-time critical Removal Action(s)
Sites 4, 16, and 21
Review of draft final *Removal Action Work Plan*

Dear Ms. Norton:

The U.S. Environmental Protection Agency (EPA) has reviewed the Navy's draft final *Removal Action Work Plan* for the non-time critical removal actions at Sites 4, 16, and 21 at the Naval Weapons Station - Yorktown NPL site (WPNSTA), and we offer the following comments and concerns:

Specific Comments

1) Section 2.4, page 4

The text references Figure 2 as presenting the construction schedule for the non-time critical removal action at sites 4, 16, and 21. However, Figure 2 does not contain the referenced schedule. Please incorporate a schedule into the final *Work Plan*.

2) Section 3.3, page 11

Please incorporate the requirement to take a detailed photographic log of the non-time critical removal action into the construction sequence, especially focusing on the removal of buried drums or material suspected of being contaminated with hazardous waste.

3) Section 3.7.4, page 16

Analysis for Picric and Picramic Acid was not included in the list of analytes as requested previously. Please include the analysis for Picric and Picramic Acid, as well as TAL metals, in the post-excavation soil sampling of the ash pile area.

4) Section 3.9, page 18

Please insure that the post-removal soil sampling outlined in Section 2.11 occurs before backfilling begins! Additionally, EPA's oversight contractor may wish to sample the post-excavation area prior to back-filling.

5) Section 4.3, page 22

Please incorporate the requirement to take a detailed photographic log of the non-time critical removal action into the construction sequence, especially focusing on the removal of buried drums or material suspected of being contaminated with hazardous waste.

6) Section 4.8, page 26

Please insure that the post-removal soil sampling outlined in Section 2.11 occurs before backfilling begins! Additionally, EPA's oversight contractor may wish to sample the post-excavation area prior to back-filling.

7) Section 5.3, page 29

Please incorporate the requirement to take a detailed photographic log of the non-time critical removal action into the construction sequence, especially focusing on the removal of buried drums or material suspected of being contaminated with hazardous waste.

8) Section 5.8, page 32

Please insure that the post-removal soil sampling outlined in Section 2.11 occurs before backfilling begins! Additionally, EPA's oversight contractor may wish to sample the post-excavation area prior to back-filling.

9) Section 6.2.2, page 36

Soil action levels as listed in the draft final *Work Plan* are still incomplete. The designated soil trigger levels or soil action levels should be expanded to include the following:

2,4-DNT	-	200	mg/kg
2,6-DNT	-	4.2	mg/kg
1,3-DNB	-	10	mg/kg

10) Section 6.2.4, page 37

The Va. NPDES discharge limits and the HRSD limits should probably be included in the final *Work Plan* for reference.

11) Appendix B

Please provide EPA with two (2) complete (all 14 sheets) final copies of the Construction Drawings for use in performing oversight activities at sites 4, 16, and 21.

12) Appendix F

Please provide EPA with four copies of the final Health & Safety Plan for insertion into Appendix F when available.

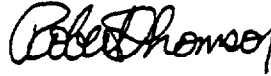
This concludes EPA's review comments on the Navy's draft final *Removal Action Work Plan* for the non-time critical removal actions at Sites 4, 16, and 21 at the WPNSTA. Please note that previously submitted comments from EPA on the draft *Work Plan* were not addressed in the draft final *Work Plan*. EPA recommends that, in the future, a summary letter outlining the Navy's responses to all EPA comments be submitted along with draft final documents. This letter would serve as a mechanism for the Navy to insure that all EPA comments are addressed, and the letter would easily identify how (and where in the draft final document) the Navy responded to the EPA comments. Such a letter would greatly expedite EPA's review (and

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acceptance) of draft final documents.

Based upon the above, EPA conditionally accepts the Navy's draft final *Removal Action Work Plan* for the non-time critical removal actions at Sites 4, 16, and 21 as final, given that the above comments are addressed and implemented during the performance of the non-time critical removal action. If you have any questions, please feel free to call me at (215) 597-1110,

Sincerely,



Robert Thomson, PE
VA/WV Superfund Federal Facilities (3HW71)

cc: Lisa Ellis (VDEQ, Richmond)
Jennifer Loftin (WPNSTA, Code 09E)
Andy Rola (BVWST, Phila)